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ONLY

June 4, 2021

Re: *United States v. Michelle Morton*, S3 16 Cr. 371 (RA)

Dear Judge Abrams:

We write to provide an update on Ms. Morton's health and vaccination efforts, pursuant to the Court's May 4, 2021 order (Dkt. No. 970), as well as to make a request regarding Ms. Morton's Bureau of Prisons ("BOP") designation.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

* * *

Separately, we write to request that the Court recommend to the BOP that Ms. Morton be permitted to serve her custodial sentence at FPC Danbury. Given the non-violent nature of Ms. Morton's conviction, her lack of criminal history, as well as the medical care that she may require and that the facility can provide, we believe that FPC Danbury will be the most appropriate facility for Ms. Morton. FPC Danbury will also facilitate her surrender and her family's ability to visit her, as it is the closest BOP facility to her home in New Jersey.

Given the above, although we are aware that the Court does not have the ability to order the BOP to designate Ms. Morton to a particular facility, we ask that the Court make that recommendation to the BOP.

Respectfully submitted,

/s/ Nola B. Heller

Nola B. Heller
Julia C. Koch

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square, Room 240
New York, New York 10007

BY EMAIL

cc: AUSA Rebecca Mermelstein
AUSA Negar Tekei
AUSA Elizabeth Hanft

Application granted. It is recommended that the Bureau of Prisons designate Ms. Morton to FPC Danbury. The Government shall advise the Bureau of Prisons of this recommendation.

SO ORDERED.



Ronnie Abrams, U.S.D.J.
June 4, 2021